REMARKS

In response to the Official Action mailed January 26, 2005, Applicants request reconsideration. In this Response, no claims are added, canceled, or amended, so that claims 1, 2, 4, and 5 remain pending.

Claims 1, 2, 4, and 5 are rejected as anticipated by Beckmann et al. (U.S. Pat. No. 6,606,559, hereinafter Beckmann). That rejection is respectfully traversed.

The Official Action contends that Beckmann teaches that an instruction is transferred between the screen control means and the application control means via a function call. The Official Action alleges this teaching is found in Beckmann at column 10, lines 35-60; however, that text makes no reference to a function call at all. The Official Action further contends that Beckmann teaches that the instruction is passes to the application by a function call. The Official Action alleges this teaching is found in Beckmann at column 11, lines 1-30. Again, the cited text of Beckmann says absolutely nothing about a function call. Still further, the Official Action contends that the instruction is then transferred to a screen control, and then to a display means, via an event queue. The Official Action alleges this teaching is found in Beckmann at column 11, lines 2-20 and 50-65; however, the cited text of Beckmann does not mention a queue of any kind.

The Official Action has no basis for the allegations that Beckmann teaches that *said screen control means transfers an instruction to said application control means using one of an event queue and a call function, said application control means transfers an instruction to said application means using one of an event queue and a call function, said application means transfers an instruction to said screen control means using an event queue, and said screen control means transfers an instruction to said display means using an event queue.* Applicants observe that the entire text of Beckmann does not ever mention the word "queue," or any synonym thereof. Nor do the figures of Beckmann show anything that could be construed as an event queue in accordance with the present invention. Moreover, Beckman makes no mention of a function, as that term is used in the realm of computer programming. One of ordinary skill in the art will recognize that the term "function call" has a meaning specific to the field of computer programming and application development. Beckmann does not describe a navigation system in this level of detail, i.e., Beckmann does not describe application development for a navigation system. Thus, Beckmann does not teach a function call of any kind. Accordingly, the assertion that Beckman teaches the above-recited limitation is untenable.

Neither Beckman nor the conventional art teaches a physical position navigation device that includes an application control means to control applications based on the internal state of the physical navigation device, such that applications may be developed without understanding the operation of the physical position navigation device. This feature alleviates a problem endemic to physical position navigation devices, which typically provide no application program interfaces (APIs) for developing applications, and which may determine physical position based on different sets of information.

Accordingly, Beckmann fails to teach every limitation of claims 1, 2, 4, and 5. Thus, the rejection is erroneous and should be withdrawn.

The application is considered in good and proper form for allowance. If, in the opinion of the Examiner, a telephone conference would expedite the allowance of the application, the Examiner is invited to call the undersigned attorney.

Respectfully submitted,

A. Wesley Ferrebee, Reg. No. 51,312
LEYDIG, VOIT & MAYER
700 Thirteenth Street, N.W., Suite 300
Washington, DC 20005-3960
(202) 737-6770 (telephone)
(202) 737-6776 (facsimile)

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AWF/

Amendment or ROA - Regular (Revised 7/29/03)